

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Cr. No. 05-1849 JH
	)	
DANA JARVIS, et al.,	)	
	)	
Defendants.	)	

**NOTICE OF EXPERT WITNESSES**

COMES NOW the United States of America, by and through David C. Iglesias, United States Attorney for the District of New Mexico, and James R.W. Braun, Assistant United States Attorney for said district, and hereby notifies the defendants that it intends to introduce the following expert testimony in its case-in-chief in the above-captioned case.

1. Drug Enforcement Administration Forensic Chemists:

Sanford Angelos (DEA North Central Lab, Chicago – Retired)

Based on his observations and laboratory tests, coupled with his training and experience as a DEA chemist, Mr. Angelos will give his opinion that DEA Exhibits 1 (1a-1k), 2 (2a-2k), 3, 4, and 5 contain marijuana. A summary of Mr. Angelos's testimony is attached hereto as Exhibit 1. Mr. Angelos's resumé is attached hereto as Exhibit 2.

Camela Dubach (DEA North Central Lab, Chicago)

Based on her observations and laboratory tests, coupled with her training and

experience as a DEA chemist, Ms. Dubach will give her opinion that DEA Exhibit 6 contains cocaine hydrochloride. A summary of Ms. Dubach's testimony is attached hereto as Exhibit 3. Ms. Dubach's resumé is attached hereto as Exhibit 4.

Carrie Gallagher (DEA North Central Lab, Chicago)

Based on her observations and laboratory tests, coupled with her training and experience as a DEA chemist, Ms. Gallagher will give her opinion that DEA Exhibits 11 and 15 contain marijuana and that DEA Exhibit 14 contains cocaine hydrochloride. A summary of Ms. Gallagher's testimony is attached hereto as Exhibit 5. Ms. Gallagher's resumé is attached hereto as Exhibit 6.

Anthony Harris (DEA North Central Lab, Chicago)

Based on his observations and laboratory tests, coupled with his training and experience as a DEA chemist, Mr. Angelos will give his opinion that DEA Exhibits 1, 2, 3, 4.01, 5, 8, 9, 10A-10K, 12, and 13 contain marijuana. A summary of Mr. Harris's testimony is attached hereto as Exhibit 7. Mr. Harris's resumé is attached hereto as Exhibit 8.

James Iwamoto (DEA South Central Lab, Dallas)

Based on his observations and laboratory tests, coupled with his training and experience as a DEA chemist, Mr. Iwamoto will give his opinion that DEA Exhibits 1 (1a-1k), 7, 8, 10, 11, 19, 20, 24, 25, 26, and 31 contain marijuana, and that DEA Exhibit 9 contains Psilocin. A summary of Mr. Iwamoto's testimony is attached hereto as Exhibit

9. Mr. Iwamoto's resumé is attached hereto as Exhibit 10.

Christy Reisen (Eastern Nebraska Forensic Lab, Omaha)

Based on her observations and laboratory tests, coupled with her training and experience as a DEA chemist, Ms. Reisen will give her opinion that Items 1-11, Sarpy County case number 16214-05 (DEA Exhibit 32) contains marijuana. A summary of Ms. Reisen's testimony is attached hereto as Exhibit 11. Ms. Reisen's resumé is attached hereto as Exhibit 12.

2. Drug Enforcement Administration Special Agent Richard Stark

Based on his knowledge, skill, training, experience, and education, Agent Stark will testify generally regarding the business of drug trafficking and the tools of the drug trafficking trade. Agent Stark will also testify regarding the defendants' use of code words during the intercepted telephone conversations that will be introduced at trial, and regarding his analysis of the drug ledgers seized from 1440 Calle Cielo Vista in Bernalillo New Mexico on August 25, 2005 (DEA Exhibit N-192). Agent Stark's resumé is attached hereto as Exhibit 13.

3. Internal Revenue Service CID Special Agent Michael Albers

Based upon his education, training and experience, Agent Albers will testify as to scheduling and summary of records and documentary evidence in this case and defendant Dana Jarvis's unexplained source of funds. A summary of Agent Albers' testimony is contained in exhibits 14, 15, 16, 17, 18 19, 20, 21 and 22, attached hereto. Agent Albers'

resumé is attached hereto as exhibit 23.

4. Internal Revenue Service Revenue Agent Joselyn Somera

Based upon her education, training and experience, Agent Somera will testify as to scheduling and summary of records and documentary evidence in this case. A summary of Agent Somera's testimony is contained in exhibits 17, 18, 20, 21, and 22, attached hereto. Agent Somera's resumé is attached hereto as exhibit 24.

Respectfully submitted,

DAVID C. IGLESIAS  
United States Attorney

*/s/ James R.W. Braun*

JAMES R.W. BRAUN  
STEPHEN R. KOTZ  
Assistant U.S. Attorneys  
P.O. Box 607  
Albuquerque, NM 87103  
(505) 346-7274

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 25<sup>th</sup> day of January, 2007, I filed the foregoing pleading electronically through the CM/ECF system, which caused counsel of record for the defendants to be served by electronic means.

*/s/ James R.W. Braun*

JAMES R.W. BRAUN  
Assistant U.S. Attorney